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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JENNIFER L. KASILAG, LOUIS MELLINGER,  
JUDITH M. MENENDEZ, JACQUELINE M.  
ROBINSON, and LINDA A. RUSSELL, *et al.*,  
Plaintiffs,

vs.

HARTFORD INVESTMENT FINANCIAL  
SERVICES, LLC,

Defendant.

Civil Action No. 11-cv-1083 (RMB)(KMW)

and

Civil Action No. 14-cv-1611 (RMB)(KMW)

JENNIFER L. KASILAG, LOUIS MELLINGER,  
JUDITH M. MENENDEZ, JACQUELINE M.  
ROBINSON, LINDA A. RUSSELL, DENNIS  
RUSSELL, AND DARIN DUDEK, ON BEHALF OF  
AND FOR THE BENEFIT OF THE HARTFORD  
HEALTHCARE FUND, THE HARTFORD  
CONSERVATIVE ALLOCATION FUND, THE  
HARTFORD GROWTH OPPORTUNITIES FUND,  
THE HARTFORD INFLATION PLUS FUND, THE  
HARTFORD BALANCED FUND, THE  
HARTFORD CAPITAL APPRECIATION FUND,  
THE HARTFORD FLOATING RATE FUND, AND  
THE HARTFORD SMALL COMPANY FUND  
Plaintiffs,

vs.

HARTFORD FUNDS MANAGEMENT  
COMPANY, LLC,

Defendant.

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
MOTION TO SEAL OF WELLINGTON  
MANAGEMENT GROUP LLP AND  
WELLINGTON MANAGEMENT  
COMPANY LLP**

FILED ELECTRONICALLY

Wellington Management Group LLP and Wellington Management Company LLP (collectively “Wellington”), Plaintiffs Jennifer L. Kasilag, Louis Mellinger, Judith M. Menendez, Jacqueline M. Robinson, Linda A. Russell, Dennis Russell, and Darin Dudek, (“Plaintiffs”) and Defendants Harford Investment Financial Services, LLC and Hartford Funds Management Company, LLC (“Defendants”) through their undersigned counsel, hereby respectfully submit this Stipulation and [Proposed] Order Regarding the Motion to Seal filed by Wellington (the “Stipulation”).

WHEREAS, as described in greater detail below, the purpose of this stipulation is to prevent duplicative filings by Wellington and Plaintiffs relating to Wellington’s Motion to Seal certain information, and Plaintiffs’ opposition thereto;

WHEREAS, on June 5, 2015, Plaintiffs filed a Motion for Partial Summary Judgment and Defendants filed a Motion for Summary Judgment (together, the “Summary Judgment Motions”) (ECF Nos. 143-147);<sup>1</sup>

WHEREAS, Plaintiffs included as exhibits in support of their Motion for Summary Judgment three documents (the “Wellington Documents”) Wellington contends contain competitively sensitive, confidential internal financial information (“Wellington Confidential Information”), and Plaintiffs made reference to that Wellington Confidential Information in their Rule 56.1 Statement, their Memorandum in Support of Summary Judgment and in supporting materials; and

WHEREAS, on June 15, 2015, Wellington filed a Motion to Intervene and a Motion to Seal the Wellington Documents and redact the Wellington Confidential Information from the

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<sup>1</sup> Reference to docket numbers (*i.e.* “ECF No. \_\_”) are to the docket in *Kasilag v. Hartford Inv. Servs., LLC*, No. 11-01083 (D.N.J. Nov. 14, 2011).

public version of Plaintiff's summary judgment papers (ECF No. 149) ("Wellington's June 15, 2015, Motion to Seal"); and

WHEREAS, on July 13, 2105, Plaintiffs filed an Opposition to Wellington's June 15, 2015, Motion to Seal (ECF No. 162) ("Plaintiffs' July 13, 2015 Opposition to Wellington's June 15, 2015, Motion to Seal"); and

WHEREAS, Wellington filed its Reply Brief on July 20, 2015, (ECF No. 164); and

WHEREAS, as described below, information that was the subject of Wellington's June 15, 2015, Motion to Seal was also filed in subsequent submissions and Wellington seeks to seal that information for the same reasons set forth in its June 15, 2015 Motion to Seal, and Plaintiffs oppose the sealing of such information for the same reasons set forth in Plaintiffs' July 13, 2015, Opposition to Wellington's June 15, 2015, Motion to Seal;

WHEREAS, on July 22, 2015, Plaintiffs filed under seal an Opposition to Defendants' Motion for Summary Judgment and supporting papers, including expert reports, and a Reply in further of support of their Motion for Summary Judgment (collectively "Plaintiffs' Additional Summary Judgment Filings"); and

WHEREAS, Plaintiffs' Additional Summary Judgment Filings contain Wellington Confidential Information that is subject to Wellington's June 15, 2015, Motion to Seal and that Wellington contends should be sealed or redacted from public filings and Plaintiffs oppose the sealing of that information for the reasons set forth in Plaintiffs' July 13, 2015, Opposition to Wellington's June 15, 2015, Motion to Seal; and

WHEREAS, Hartford Defendants have filed an Opposition to Plaintiffs' Motion for Summary Judgment and supporting papers (collectively "Defendants' Opposition Filings") that

make reference to the Confidential Wellington Information contained in the Wellington Documents;

WHEREAS, Wellington contends that the Wellington Confidential Information in the Plaintiffs' Additional Summary Judgment filings and Defendants Opposition filings should be sealed or redacted from the publicly available for the reasons stated in Wellington's June 15, 2015, Motion to Seal; and

WHEREAS, Plaintiffs oppose the sealing of such information for the same reasons set forth in Plaintiffs' July 13, 2015, Opposition to Wellington's June 15, 2015, Motion to Seal

WHEREAS, to avoid filing duplicative motions to seal regarding the same type of information already subject to the Wellington's Motion to Seal, Wellington has conferred with Plaintiffs and Defendants, and Plaintiffs, Defendants, and Wellington have agreed that Wellington's June 15, 2015, Motion to Seal shall apply to the Confidential Wellington Information contained in the Plaintiffs' Additional Summary Judgment Filings and Defendants Opposition Filings, and that Wellington does not need to file additional motions in support of its argument to seal those Filings or redact the Wellington Confidential Information in those filings; and

WHEREAS, to avoid the filing of duplicative opposition motions by Plaintiffs to Wellington's sealing requests, Plaintiffs, Defendant, and Wellington agree that Plaintiffs' July 13, 2015, Opposition to Wellington's June 15, 2015, Motion to Seal shall serve as Plaintiffs' Opposition to Wellington's request to seal the information contained in Plaintiffs' Additional Summary Judgment Filings and Defendants Opposition Filings; and

WHEREAS, the Parties and Wellington have agreed that the rulings of the Court on Wellington's Motion to Seal will govern any further use of the Wellington Documents or Wellington Confidential Information in these cases.

NOW, THEREFORE, the Parties and Wellington hereby STIPULATE AND AGREE, by and through their undersigned counsel and subject to the Court's approval, as follows:

Wellington's Motion to Seal and the relief sought therein; and Plaintiffs' Opposition thereto, and the respective arguments made therein shall be deemed to apply (1) to the use of the Wellington Documents and or Wellington Confidential Information in the Plaintiffs' Additional Judgment Filings and Defendants' Opposition Filings, and, until the date of the Court's ruling on Wellington's Motion to Seal and Plaintiffs opposition thereto, (2) to any further use of the Wellington Documents and/or the Wellington Confidential Information in these cases, without the need for Wellington to file additional motions to seal.

Dated: September 10, 2015

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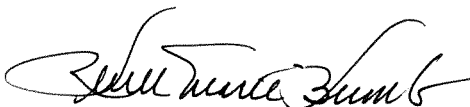
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SO ORDERED

September 11, 2015

  
Hon. Renee Marie Bumb, U.S.D.J.  
District of New Jersey